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Attorneys for Relator STF, LLC

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA *ex rel.* STF,
LLC, an organization; STATE OF
CALIFORNIA; *ex rel.* STF, LLC, an
organization,

Plaintiffs,

V.

VIBRANT AMERICA, LLC, a Delaware limited liability company,

Defendants.

Case No. 3:16-cv-02487-JCS

JOINT UPDATED CASE MANAGEMENT CONFERENCE STATEMENT

Date: March 19, 2021

Time: 2:00 p.m.

Judge: Hon. Joseph C. Spero

JOINT UPDATED CASE MANAGEMENT CONFERENCE STATEMENT

Relator STF, LLC (“Relator”), and Vibrant America, LLC (“Vibrant” or “Defendant”), submit this Joint Updated Case Management Conference Statement.

1. **Discovery:** Both Parties have issued and responded to extensive document requests, and Vibrant has issued interrogatory requests to which Relator has responded. Relator has taken a Rule 30(b)(6) deposition. The Parties agreed to, and the Court approved, an Attorneys' Eyes Only ("AEO") designation for certain confidential information related to Vibrant's business operations and financial data to be produced by Vibrant.

9 2. **ADR:** Due to logistical issues given the COVID pandemic, one of the parties
10 was unavailable for the mediation before Martin Quinn, of JAMS, scheduled for February 4, 2021.
11 The mediation has been continued until March 22, 2021.

12 3. **CMC Continuance Request:** The Parties are focused on the March 22
13 continued mediation. The Parties do not have discovery issues at present that require guidance
14 from the Court at this time. Accordingly, the Parties respectfully request that the March 19 CMC
15 be continued for approximately 30 days.

Dated: March 12, 2021

COTCHETT, PITRE & McCARTHY LLP

By: /s/ Justin T. Berger
JUSTIN T. BERGER
BETHANY M. HILL

Attorneys for Relator

Dated: March 12, 2021

FOLEY & LARDNER LLP

Attorney for Defendant Vibrant America, Inc.